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New Haven, CT

Mr. Joshi,

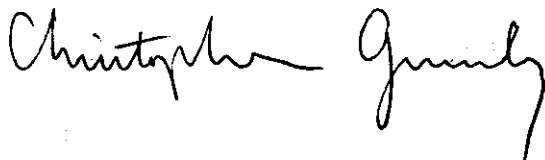
I would like to voice my concern to you with regard to the proposed change in definition of "substantial damage" for helicopters. While it is true that the rotor blades are the lifting and controlling surfaces, they should not always be considered analogous to the wings and rudders of airplanes for reporting purposes. Unlike the wings of an airplane, which are vital for the structural integrity of the aircraft, the rotor blades are modular components that can easily and quickly be removed and repaired. A ground strike that damages only the rotor blades is an event that should certainly be investigated by a qualified mechanic, but does not warrant a full investigation on the scale of an accident. Although the rotor blades are the critical components for flight, the kind of inspection and repair that is involved blade strike damage is far less significant than the analogous repair and inspection for fixed-wing aircraft.

That this type of damage should be reported as an accident "regardless of how it occurs" is problematic. The nature of helicopter operations in close proximity to the ground or ground objects is very different from that of fixed-wing aircraft, and should be taken into account. A blade strike that causes no additional damage to the aircraft would have to occur at extremely low altitude and airspeed. Reporting these occurrences as accidents will result in inaccurate safety statistics, and will cause unnecessary and undeserved damage to the reputation of pilots, operators, manufacturers, and the industry on the whole. Most important, it will not in any way improving the safety of helicopter flight.

I would suggest that if the NTSB would like rotor blade ground strikes to be reported, that they be reported as "incidents" rather than "accidents." This will give the NTSB the quantity of statistical information it needs, without lowering the quality.

Please feel free to contact me if I can be of any further assistance.

Sincerely,

A handwritten signature in cursive script, reading "Christopher Grundy". The signature is written in dark ink on a white background.